

PETER C. WOLFF, JR. #2332
Federal Public Defender
District of Hawaii

MAX J. MIZONO #10245
Assistant Federal Defender
300 Ala Moana Boulevard, Suite 7104
Honolulu, Hawaii 96850-5269
Telephone: (808) 541-2521
Facsimile: (808) 541-3545
E-Mail: max_mizono@fd.org

Attorney for Defendant
JACOB LYMAN

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CR. NO. 12-01256-DKW
)
Plaintiff,) DEFENDANT JACOB LYMAN'S
) MOTION TO REDUCE SENTENCE
vs.) PURSUANT TO 18 U.S.C. §
) 3582(c)(1)(A)(i) (COMPASSIONATE
JACOB LYMAN,) RELEASE); MEMORANDUM IN
) SUPPORT OF MOTION;
Defendant.) DECLARATION OF COUNSEL;
) EXHIBITS "A" – "H"; CERTIFICATE
) OF SERVICE
)

**DEFENDANT JACOB LYMAN'S
MOTION TO REDUCE SENTENCE PURSUANT TO
18 U.S.C. § 3582(c)(1)(A)(i) (COMPASSIONATE RELEASE)**

Defendant JACOB LYMAN, by and through counsel, MAX J. MIZONO,
Assistant Federal Defender, respectfully moves this Honorable Court, pursuant to
18 U.S.C. § 3582(c)(1)(A)(i) ("compassionate release statute"), to reduce his

sentence to time served. As amended by the First Step Act, the compassionate release statute allows courts to reduce sentences for “extraordinary and compelling” reasons. The growing COVID-19 pandemic, which public health experts and policymakers recognize is especially dangerous in the confines of correctional institutions, and especially so at FCI Lompoc, in tandem with Mr. Lyman’s health issues, together present as extraordinary and compelling circumstances under 18 U.S.C. § 3582(c)(1)(A)(i). The § 3553(a) factors also support his request.

This motion is based on the attached Memorandum in Support of Motion, the records and files herein, as well as any other evidence that may be adduced at the hearing on the motion.

DATED: Honolulu, Hawaii, July 2, 2020

Respectfully submitted,

/s/ Max J. Mizono
MAX J. MIZONO
Attorney for Defendant
JACOB LYMAN